CLJA Litigation: Towards Global Resolution

September 20, 2023

We need to jointly create 8 elements

| Category | Element | Task for plaintiffs and DOJ | | | | |
|--------------------|----------------------------|--|--|--|--|--|
| Legal substance | Fields | Develop a list of data points necessary and sufficient to establish the <u>viability</u> and <u>value</u> or claim. | | | | |
| | Documentation requirements | For each data point, agree on (1) what documentation must support the data point for it to "count" and (2) which party is responsible for supplying that documentation. | | | | |
| | Valuation formulas | Design condition-specific formulas that take in certain of the agreed-upon data points and generate sum-certain settlement offers. | | | | |
| Process | Claim workflow | Design the specific processes through which (1) claimants will populate fields and supply required documentation and (2) the administrator will review submissions and make offers. | | | | |
| | Exceptional processes | Explore and agree on processes for claimants to seek additional review of extraordinary injuries. | | | | |
| | Validation & disbursement | Set up the mechanism through clients will be validated, settlements will be offered, and accepted settlements will be paid. | | | | |
| Infrastructure | Staff/administrator | Select an administrator to design the workflow in detail, hire staff to process claims, manage implementation, and report back to the parties. | | | | |
| | Data & reporting | Build a data & reporting system to store claim submissions, generate analytics, and track progress. | | | | |

High-level roadmap

| | | | _ | 30-1 | lov-23 | 31-Ja | an-24 | |
|--------------------|------------------------------|-------------------|-------------------------------------|----------------------|---|--|--------------------------------|--|
| Overall | | Conceptual design | | | Build | | >Facility becomes available | |
| Legal substance | Fields | Parties negotia | nte | | | | | |
| | Documentation requirements | | ▲Fields set Parties negotiate | | | | | |
| | Valuation formulas | | Parties discuss conceptual approach | | Requirements set Parties negotiate condition- specific formulas | | | |
| Process | Claim workflow | | | Conceptual design | Detailed design al administrator | ongside | | |
| | Exceptional processes | | | | Parties negotiate | | | |
| | Validation & disbursement | | | | bu | esign and uild with Iministrator | | |
| Infrastructure | Staff/ administrator | | RFP | | Administration standup | | | |
| | Data & reporting | | | | bu | esign and vild with dministrator | | |
| EDNC Litigation | | | | | | | Waves of condition-wise trials | |
| | С | ase 7:23-cv- | 00897-RJ [| Document 3 | 3-1 Filed 10/26 | 5/23 Page | e 3 of 3 | |